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Department of the Interior

Minerals Management Service (OMM) / CAPE WIND SCOPING - ALTERNATIVE SITES

Re: "Alternative Sites for Alternative Energy requires Comprehensive Coastal Zoning and Determination of Reproducibility of Installations"

Department of the Interior, Minerals Management Service:

The selection of "Alternative Sites" reviewed in the EIS is an extremely tricky section for the developers and the reviewing agencies. If they determine that there are no other viable comparable or acceptable Alternative Sites off-shore, then they are saying, in effect, that the proposed offshore technology is not a viable on-going Alternative Energy source in which to invest.

Clearly, any "thinking person" is in favor of Alternative Energy, but...not for a 40 story high, 24 square mile industrial complex, plunked in the middle of the National Treasure of Nantucket Sound. Nor are they for the use of already outdated turbines, that are untested in our maritime conditions, on an un-zoned, unregulated Federal "land-grab" site.

Fears of foreign oil dependency are allowing the developer of the Nantucket Sound Energy Plant to use the generic arguments for Alternative Energy solutions of all kinds to miss-lead people into believing that his proposal is the "Only Alternative". Using this combination of the "generic benefits of alternative energy" and "my project is the only alternative" approach, this developer has been consistently able to dodge the real questions put forth and to avoid exploration of viable, lower impact (but less profitable in start-up mode) "Alternatives".

We need serious answers to real questions in a valid Environmental Impact Statement (EIS). People who protest this specific Cape Wind Turbine proposal are for alternative energy, but seriously question:

- **Is this the right Site?**—in a National Natural Treasure comparable to our great National Parks like the Grand Canyon as opposed to an industrial, military or

municipal site or a true off-shore "deep-water" site in the higher wind ranges?
(We need "Comprehensive Coastal Zoning")

- **Is this the right Technology?** or should this massive (40 story high / multi-gallon oil storage, etc.) equipment be tested on land first and developed for greater efficiency and safety? Shortly new technologies will offer capabilities for higher production in lower wind ranges in urban areas near the demand grid and deep-water installations in areas of maximum wind. (We need Alternative Energy Technology and Planning Initiatives)
- **Is this the right Time?** or should our obsolete Northeast electric power distribution grid be updated first? (We need Alternative Energy Technology and Planning Initiatives)
- **Is this the right Size?** An un-tested, "largest ever" off-shore commercial scale project as opposed to phased or smaller, decentralized local or municipal based installations that would benefit the Cape and Islands area directly. (Alternative Energy Technology and Planning Initiative)
- **Is it right for Federal Land (?)** with State jurisdictions in dispute to be turned over to a private developer for profit without zoning, regulations, payment policies and de-commissioning plans in place first? ("Comprehensive Coastal Zoning" and standard EIS requirement for confirmed undisputed site survey.)
- **How is the Environmental Impact Statement (EIS) process viable**, with Army Corp of Engineers as the determining agency using primarily the developer's own consultant research materials? **Who selects Alternative Sites to be reviewed and how? Do they include onshore and de-centralized alternatives?** (Require valid Environmental Impact Statement through "Comprehensive Coastal Zoning" process.)
- **How does the visual destruction** (turbines will appear as a giant chain link fence) of the main attraction of Nantucket Sound affect the major industry of the Cape and Islands...ie: Tourism. **Are there options to avoid these and other impacts through Alternative Sites?** ("Comprehensive Coastal Zoning")
- **Navigation and Security will be difficult** (both visual and radar) with the pollution of shapes and the myriad of lights of all colors. Navigation will be impeded by structures, and no doubt eventually be access will be halted by the Coast Guard for the thousands of small 3-4' draft boats that pass over this location. **Can the developer guarantee free access and security to our waters? What do we really know about the turbine's interference with radar at the many small airports surrounding the only proposed site?**

("Comprehensive Coastal Zoning", "Alternative Energy Technology and Planning Initiative")

- **Does the risk of the many projected, but unquantifiable impacts, related to navigation, security, fish, fishing, fowl, tourism, safety, historic resources, variable output, oil storage spill, etc. create a "critical mass" of unknown, but irreversible, impacts that should require an Alternative Deep Water or Land based site for testing of this technology?** (*"Comprehensive Coastal Zoning" and (Alternative Energy Technology and Planning Initiative)*)

So the selection of "Alternative Sites" reviewed in the EIS is, indeed, a tricky section for the developers and the reviewing agencies. If they determine that there are no other viable comparable or acceptable alternative sites off-shore, then they are saying, in effect, that the proposed offshore technology is not a viable on-going Alternative Energy source in which to invest.

Inability to reproduce these power installations would be extremely damaging to all proponents of Alternative Energy. The first Alternative Energy projects must be successful---and repeatable---if they are to truly free us from foreign based oil dependency and claim the benefits of cleaner air.

A determination of the potential success through reproducibility of the proposed energy plant can only be determined by analysis of the questions above through *"Comprehensive Coastal Zoning"* in conjunction with a *"Alternative Energy Technology and Planning Initiative"*. (These initiatives would also be appropriate to the science, technology and planning resources and maritime heritage of Massachusetts!)

Sincerely,



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